

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY,  
SYLVIA DAY, JONATHAN FRANZEN,  
JOHN GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA  
ROBINSON, GEORGE SAUNDERS, SCOTT  
TUROW, and RACHEL VAIL, individually  
and on behalf of others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC,  
OPENAI GP LLC, OPENAI, LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION LLC,  
OPENAI HOLDINGS LLC, OPENAI  
STARTUP FUND I LP, OPENAI STARTUP  
FUND GP I LLC, OPENAI STARTUP FUND  
MANAGEMENT LLC, and MICROSOFT  
CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR  
BRANCH, RICH COHEN, EUGENE  
LINDEN, DANIEL OKRENT, JULIAN  
SANCTON, HAMPTON SIDES, STACY  
SCHIFF, JAMES SHAPIRO, JIA  
TOLENTINO, and SIMON WINCHESTER,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI OPCO LLC,  
OPENAI GP, LLC, OPENAI GLOBAL LLC,  
OAI CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, OPENAI STARTUP  
FUND I LP, OPENAI STARTUP FUND GP I  
LLC, OPENAI STARTUP FUND

Consolidated Cases:

Case No. 1:23-cv-08292-SHS

Case No. 1:23-cv-10211-SHS

Case No. 1:24-cv-00084-SHS

**AFFIDAVIT OF BRIANNA LYNN  
SILVERSTEIN IN SUPPORT OF  
MOTION FOR ADMISSION *PRO HAC*  
*VICE***

MANAGEMENT LLC, and MICROSOFT CORPORATION,

Defendants.

NICHOLAS A. BASBANES and NICHOLAS NGAGOYEANES (professionally known as Nicholas Gage), individually and on behalf of all others similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI GP, L.L.C., OPENAI HOLDINGS, LLC, OAI CORPORATION, LLC, OPENAI GLOBAL, LLC, OPENAI, L.L.C., and OPENAI OPCO, LLC,

Defendants.

DISTRICT OF COLUMBIA

)  
) ss:  
)

Brianna Lynn Silverstein, of full age, being duly sworn, hereby deposes and says as follows:

1. I am a Partner with the law firm of Faegre Drinker Biddle & Reath LLP, attorneys for defendant Microsoft Corporation in the above-captioned action.

1. I am admitted to practice in the highest court of the District of Columbia and the highest court of Virginia. I am a member in good standing of the highest court of the District of Columbia and the highest court of the State of Virginia. Annexed hereto as Exhibit A is a Certificate of Good Standing from the District of Columbia Court of Appeals, dated November 15, 2024 and Exhibit B is a Certificate of Good Standing from the State of Virginia, dated November 22, 2024.

2. I have never been convicted of a felony.

3. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

4. There are no pending disciplinary proceedings against me in any state or federal court.

  
Brianna Lynn Silverstein

Sworn and subscribed to before  
me this 4th day of December, 2024

  
Notary Public

